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7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff

12 v.

13 FIVE (5) VERIZON WIRELESS CARDS
14 VALUED AT \$500.00 IN U.S. CURRENCY,
15 and NINETEEN (19) AMEX BUSINESS
16 GIFT CARDS VALUED AT \$39,052.06 IN
17 U.S. CURRENCY,

Defendants.

NO. C16-0373

COMPLAINT FOR FORFEITURE *IN REM*

18 COMES NOW, the United States of America, by and through Annette L. Hayes,
19 United States Attorney for the Western District of Washington, and Matthew H. Thomas,
20 Assistant United States Attorney for said District, and alleges:

21 1. This is a Complaint for seizure and forfeiture of Five (5) Verizon Wireless
22 Cards Valued at \$500.00 in U.S. Currency, and Nineteen (19) Amex Business Gift Cards
23 Valued at \$39,052.06 in U.S. Currency, seized from Maziar Rezakhani's storage unit
24 located at 688 110th Avenue, NE, Unit #S-3301, Bellevue, Washington, (hereinafter, "the
25 defendant property"), brought pursuant to Title 18, United States Code, Section
26 981(a)(1)(C), as proceeds of violation of Title 18, United States Code, Section 1344
27 (Bank Fraud).
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1 2. This Court has jurisdiction over this action pursuant to Title 28,
2 United States Code, Sections 1345 and 1355.

3 3. This Court has venue pursuant to Title 28, United States Code,
4 Section 1395.

5 4. The defendant property as described above is now in the jurisdiction of this
6 Court.

7 5. Additional facts supporting the forfeiture of the defendant property are set
8 forth in the attached Affidavit of Internal Revenue Service (IRS) Special Agent Roberto
9 A. Ustaris, which is attached as Exhibit A and incorporated as if fully set forth in this
10 Complaint.

11 6. By reason of the foregoing, the United States alleges that the defendant
12 property is subject to forfeiture pursuant to Title 18, United States Code,
13 Section 981(a)(1)(C), as proceeds of violations of Title 18, United States Code,
14 Section 1344 (Bank Fraud).

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WHEREFORE, the United States requests that due process issue to enforce the forfeiture of the defendant property, that due notice be given to all interested persons to appear and show cause why forfeiture of the defendant property should not be decreed, that the defendant property be condemned as forfeited to the United States to be disposed of according to law, and for such other and further relief as the Court may deem just and proper.

DATED this 11th day of March, 2016.

Respectfully submitted,

ANNETTE L. HAYES
United States Attorney

s/Matthew H. Thomas

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Attorney for Plaintiff United States

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